

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

ALEXANDRIA ALLEN	)	
	)	
Plaintiff,	)	
	)	Case No. _____
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
Serve: Office of U.S Attorney General	)	
U.S. Department of Justice	)	
950 Pennsylvania Ave NW	)	
Washington DC 25030-0001	)	
	)	
Serve: Office of United States Attorney	)	
Thomas Eagleton U.S. Courthouse	)	
111 S. 10th Street, 20th Floor	)	
St. Louis, MO 63102	)	
	)	
	)	
Defendant.	)	

**COMPLAINT**

Plaintiff, Alexandria Allen for her cause of action against Defendant state as follows:

1. Plaintiff is a resident of the State of Missouri.
2. Plaintiff brings this action pursuant to 28 U.S.C. § 2671, et seq., the Federal Tort Claims Act.
3. All administrative remedies have been timely filed, pursued, and exhausted pursuant to 28 U.S.C. § 2671-2675.
4. At all times mentioned herein, The United States Postal Service was an employee of the United States of America and, at all times mentioned herein, was acting within the course and scope of employment with the United States of America at the time of the incident out of which this suit arises.

5. Defendant United States of America is subject to this Court's supplemental jurisdiction, pursuant to 28 U.S.C. § 1367.

6. On May 22, 2018, Plaintiff was stopped 15<sup>th</sup> Street at or near Clark in the City of St. Louis Missouri when Defendant United States of America, through its agent, servant and/or employee, operating a United States Postal Service vehicle, struck vehicle driven by the Plaintiff, injuring Plaintiff as more fully set out below.


7. Said collision occurred as a direct result of the negligence of Defendant United States of America in one or more of the following respects:

- a) Defendant operated their vehicle at an excessive speed;
- b) Defendant failed to keep a careful lookout;
- c) Defendant failed to yield;
- d) Defendant failed to stop, swerve, slacken speed or sound a warning; and/or
- e) Defendant failed to adequately maintain the vehicle.

As a direct result of the negligence of Defendant as aforesaid, Plaintiff sustained injury to her back; she has incurred medical expenses in excess of \$13,082.00; she has lost wages in an amount not yet determined and will in the future lose wages; her ability to work, labor and enjoy life has been and will in the future be impaired, all to her damage.

WHEREFORE, Plaintiff pray judgment against Defendant in an amount that is fair and reasonable, in excess of the minimum jurisdiction of this together with costs expended herein, and for such other relief as the Court considers proper under the circumstances.

**THE S.E. FARRIS LAW FIRM**



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Date: 7/17/19